

EXHIBIT 1

MB

**From:** Michael Bush [frymesomebacon@protonmail.com](mailto:frymesomebacon@protonmail.com)  
**Subject:** Re: Michael Bush v. The Wang Center for the Performing Arts, Inc., Case 1:22-cv-10473-GAO (D. Mass.)  
**Date:** May 20, 2022 at 10:06 AM  
**To:** Tavares, Kelsey [Kelsey.Tavares@us.dlapiper.com](mailto:Kelsey.Tavares@us.dlapiper.com)  
**Cc:** Falby, Bruce E. [Bruce.Falby@us.dlapiper.com](mailto:Bruce.Falby@us.dlapiper.com)

Hi Kelsey, (you may address me as Mike or Mr. Bush, I'll take no offense either way)

Thank you for introducing yourselves.

I assume you seek leave to file such a reply pursuant to Local Rule of Civil Procedure 7.1(b)(3).

Attorney Chambers mentioned to me that you asked for such assent from me but he did not specify why you seek to file such a reply, nor do I see such an explanation in your below message to me as a now pro se plaintiff. Thus, I am unaware of why justice demands your client be allowed to file such a reply.

Given that the content of Bruce's memorandum supporting The Wang Center's motion to dismiss far exceeded both the content of my complaint and the content of my opposition to the motion to dismiss it, I believe The Wang Center has already taken more than a fair shot at dismissing my complaint. For The Wang Center to add another 10 page document to its motion strikes me as overkill and unfair. Thus, though I am sorry I cannot assent to your first such request of me, I cannot in good conscience assent to that motion for leave.

But if you believe justice somehow demands The Wang Center be allowed to add more to its motion to dismiss, then I will accommodate a Local Rule 7.1(a)(2) conference regarding such a motion for leave to file a reply. We could perhaps discuss that as part of our Federal Rule of Civil Procedure 26(f) conference, which 26(f)(1) required us to have conducted by now. Monday, Tuesday, and Friday of next week look fairly flexible for me. The following week also looks pretty flexible. You're welcome to suggest a day and time that would work well for you.

Kind Regards,  
Mike Bush  
280 Lowell Street  
Carlisle MA 01741  
Phone: 978-734-3323

On May 19, 2022, at 6:00 PM, Tavares, Kelsey <[Kelsey.Tavares@us.dlapiper.com](mailto:Kelsey.Tavares@us.dlapiper.com)> wrote:

Hello Mr. Bush,

We represent The Wang Center for the Performing Arts, Inc. ("The Wang Center") in the above-captioned action. We conferred with your counsel yesterday regarding a motion we intend to file seeking leave to file a reply in support of our motion to dismiss and asked for his assent to our motion. He indicated that he was fine with providing his assent and would discuss this with you and get back to us today, but since that time, the Court granted his Motion to Withdraw.

As such, we are following up with you directly. If you could please let us know whether you will provide your assent to our filing a 10-page Reply within 2 weeks of the Court's order on our motion.

Thanks,  
Kelsey

**From:** Richard Chambers <[richard@chamberslawoffice.com](mailto:richard@chamberslawoffice.com)>  
**Sent:** Thursday, May 19, 2022 5:50 PM  
**To:** Tavares, Kelsey <[Kelsey.Tavares@us.dlapiper.com](mailto:Kelsey.Tavares@us.dlapiper.com)>  
**Cc:** 'Dianna Ploss' <[dianna@chamberslawoffice.com](mailto:dianna@chamberslawoffice.com)>; [matt@chamberslawoffice.com](mailto:matt@chamberslawoffice.com); Falby, Bruce E. <[Bruce.Falby@us.dlapiper.com](mailto:Bruce.Falby@us.dlapiper.com)>; 'Michael Bush' <[frymesomebacon@protonmail.com](mailto:frymesomebacon@protonmail.com)>  
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